REMARKS

Claims 1-23 are in the application. Claims 1, 11, and 23 have been amended.

Applicant has corrected the Abstract as requested by the Examiner.

Applicant has further corrected Figs. 19-22 as requested by the Examiner. Corrected Figs. 19-22 are enclosed.

Applicant has further updated the references to co-pending applications in the specification to add U.S. Patent Application Serial numbers.

Applicant has also amended claim 1 to recite that the processor readable medium "encodes" the data structure recited in the body of the claim. Applicant has further amended claim 1 to define certain interrelationships between the pointers in this data structure and the processor as follows:

> a pointer to a sequence of one or more commands, for execution by a processor, implementing one or more packet modification operations and stored in a first memory area; and
>
> a pointer to a burst of one or more data or mask items for use by the processor in executing the one or more commands stored in a second memory area distinct from the first.

"[A] claimed computer-readable medium encoded with a data structure defines structural and functional interrelationships between the data structure and the computer hardware and software components which permit the data structure's functionality to be realized, and is thus statutory." (*See* Office Action, page 4). Therefore, by these amendments, claims 1-11 are statutory, and the rejection under 35 U.S.C. §101 should be withdrawn.

Independent claims 1, 11 and 23 are rejected under 35 U.S.C. §103 over Navada in view of Krishnan, with the Examiner considering the pointers referenced in par. 24 of Krishnan to correspond to the claimed "pointer to a sequence of one or more commands," and the pointers illustrated in Fig. 2 of Navada to correspond to the claimed "pointer to a burst of one or more data or mask items."

However, one of ordinary skill in the art would not have been motivated to combine, into the same data structure, the pointers referenced in par. 24 of Krishnan with

the pointers illustrated in Fig. 2 of Navada, as the Examiner claims, because these pointers perform redundant functions.

In particular, the pointers referenced in par. 24 of Krishnan merely identify next hop information for a packet, such as a destination port identifier:

> network identification array. The logical network identification array may be implemented as a sparse array of pointers where a location in the array corresponds to a logical network. In other words, e.g., when the value at location 4 in the logical network identification array is '^', which represents a non-null pointer to next hop information, logical network 4 is represented in the logical network identification array. If, on the other hand, at location 3 the value is '0', which represents a null pointer, the logical network 3 is not represented. Next hop information preferably includes a port identifier. The port identifier identifies a port, such as

(Krishnan, par. 24).

Similarly, in the context of IP data communications, the pointers illustrated in Fig. 2 of Navada merely identify the destination port identifier for a packet:

> **[0037]** In the context of tables used for IP data communications, an IP address from the header of a data packet/datagram "packet") is often used as the key **216** to find associated information about the packet, such as a destination port number, the sender's access privileges and location on a network, or applicable VLAN rules. In one example embodiment, the example TME **200** is used as a VLAN rule table or to manage a VLAN rule table.

(Navada, par. 37).

Thus, the pointers illustrated in Fig. 2 of Navada and those referenced in par. 24 of Krishnan perform the same function. Since these pointers perform the same function, there would have been absolutely no reason to combine them into the same data structure as the Examiner claims. The obviousness rejection fails on this basis alone.

Even more so, even if these pointers were somehow to be combined into the same data structure, in any such combination, the pointers referenced in par. 24 of Krishnan would not in fact correspond with the claimed "pointer to a sequence of one or more commands." That is because the claims require that these pointers be 1) to a sequence of one or more commands; 2) for execution by a processor; that 3) implement one or more

packet modification operations, but the pointers referenced in par. 24 of Krishnan do not satisfy any of these requirements. Rather, as previously indicated, the pointers referenced in par. 24 of Krishnan merely identify next hop information, such as a destination port identifier for a packet. (*See* Krishnan, par. 24). But a pointer to next hop information for a packet is not a pointer 1) to a sequence of one or more commands; 2) for execution by a processor; that 3) implements one or more packet modification operations. Thus, the obviousness rejection fails for this additional basis.

In sum, there is no suggestion, teaching or motivation to combine the pointers referenced in par. 24 of Krishnan with the pointers illustrated in Fig. 2 of Navada to form a data structure, and, even if such a combination were to occur, the pointers referenced in par. 24 of Krishnan do not meet the requirements of the claimed "pointer to a sequence of one or more commands." Therefore, the obviousness rejection of claims 1-11, 14-23 on the basis of Navada and Krishnan should be withdrawn. Similarly, the obviousness rejections of claims 12-13 on the basis of Navada and Krishman applied to claim 11, and further in view of Shankar, should also be withdrawn because nothing in Shankar cures the deficiencies in the teachings of Navada and Krishman.

For all the foregoing reasons, reconsideration of and withdrawal of all outstanding rejections is respectfully requested. The Examiner is earnestly solicited to allow all claims, and pass this application to issuance.

To expedite allowance of this case, the Examiner is earnestly invited to call Robert C. Laurenson at (949) 759-5269.

Respectfully submitted,

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